

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
State Bar No. 8540
4 411 E. Bonneville Avenue, Suite 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6
Attorneys for Jose Jesus Cortes-Bravo
7
8

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 JOSE JESUS CORTES-BRAVO,
15 Defendant.
16

2:14-cr-412-RFB-VCF

STIPULATION TO CONTINUE
SENTENCING HEARING

(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United
18 States Attorney, and Robert A. Bork, Assistant United States Attorney, counsel for the United States
19 of America, and Rene L. Valladares, Federal Public Defender, and RAQUEL LAZO, Assistant
20 Federal Public Defender, counsel for JOSE JESUS CORTES-BRAVO, that the sentencing hearing
21 currently scheduled for Wednesday, June 24, 2015 at the hour of 10:30 a.m., be vacated and set to
22 a date and time convenient to this Court but no earlier than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. The presentence investigation report was disclosed on June 10, 2015. Additional time
25 is needed to review it with client.

26 2. Additionally, the presentence investigation report does not comport with the
27 Guidelines calculations contained in the guilty plea agreement. Defense counsel requires time to
28 prepare and draft formal objections with respect to the offense level and criminal history category.

1 3. Defense counsel is out of the jurisdiction at a conference from June 17, 2015 to
2 June 20, 2015.

3 4. Additionally, defense counsel will be in trial in United States v. Warras, District
4 Court Case No. 2:13-cr-439-LDG-VCF, on Tuesday, July 21, 2015. The trial is expected to last
5 approximately two (2) weeks.

6 5. The defendant is incarcerated and agrees to the continuance in this matter.

7 6. This is the first stipulation to continue filed herein.

8 DATED this 17th day of June, 2015.

9
10 RENE L. VALLADARES
Federal Public Defender

DANIEL BOGDEN
United States of Attorney

11 /s/ Raquel Lazo

/s/ Robert A. Bork

12 By: _____
13 RAQUEL LAZO,
Assistant Federal Public Defender

By: _____
ROBERT A. BORK,
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:14-cr-412-RFB-VCF

Plaintiff,

ORDER

vs.

GREGORY WALKER,

Defendant.

ORDER

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Wednesday, June 24, 2015 at the hour of 10:30 a.m., be vacated and continued to **Wednesday, August 26, 2015** at the hour of **10:30 a.m.**

DATED this 17th day of June, 2015.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE